

Amy F. Sorenson, Esq.
Nevada Bar No. 12495
Nathan G. Kanute, Esq.
Nevada Bar No. 12413
Snell & Wilmer L.L.P.
50 West Liberty Street, Suite 510
Reno, Nevada 89501-1961
Telephone: (775) 785-5440
Facsimile: (775) 785-5441
asorenson@swlaw.com
nkanute@swlaw.com
*Attorneys for Wells Fargo Bank, N.A. and
Federal Home Loan Mortgage Corporation*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company,

Plaintiff,

v.

MARK DANIEL SNYDER, an individual;
WELLS FARGO BANK, N.A.; DOES I
THROUGH X; and ROE
CORPORATIONS 1 THROUGH 10,

Defendants.

WELLS FARGO BANK, N.A., a national
banking association,

Counter-Claimants,

v.

COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company, ABSOLUTE
COLLECTION SERVICES, LLC, a Nevada
limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

Counter-Defendants.

Case No.: 2:16-cv-01640-JCM-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF FEDERAL HOME
LOAN MORTGAGE
CORPORATION'S MOTION FOR
SUMMARY JUDGMENT**

(FIRST REQUEST)

1 FEDERAL HOME LOAN MORTGAGE
2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada
6 limited-liability company, ABSOLUTE
7 COLLECTION SERVICES, LLC, a Nevada
8 limited liability company; NUEVO VISTA
HOMEOWNERS ASSOCIATION, INC., a
Nevada non-profit cooperative corporation,

Counter-Defendants.

9 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation
10 (“Freddie Mac”), Collegium Fund LLC, Series 32 (“Collegium Fund”), Absolute Collection
11 Services, LLC (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and
12 through their respective counsel, hereby respectfully request that the Court enter an order, pursuant
13 to Local Rules 6-1 and 7-1, extending the time for Freddie Mac to file a reply in support of its
14 Motion for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF No. 26]
15 and joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The reply in support of the MSJ is
16 currently due on May 5, 2017. The Parties have agreed to extend this response date to May 26, 2017.

17 The extension is being sought in good faith and will not unduly delay this litigation.
18 Collegium Fund filed its opposition to the MSJ on April 18, 2017 under seal. The opposition is
19 roughly 30 pages and raises a number of issues. Freddie Mac is in need of additional time to review
20 and respond to the opposition filed by Collegium Fund. Given the volume of litigation related to the
21 HOA foreclosures and the issues raised by the opposition, the standard two week reply deadline will
22 not offer sufficient time for a Freddie Mac to present its reply. The requested extension will give
23 Freddie Mac three weeks additional weeks to prepare the reply, which is commensurate with the
24 extensions the Parties agreed to for the oppositions to the MSJ.

25 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend
26 the time to file a reply in support of the MSJ from May 5, 2017 to May 26, 2017.

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DATED this 24th day of April, 2017.

CONNAGHAN|NEWBERRY

SNELL & WILMER L.L.P.

/s/Tara Clark Newberry (with permission)

/s/ Nathan G. Kanute

Paul R. Connaghan, Esq.
Nevada Bar No. 3229
Tara Clark Newberry, Esq.
Nevada Bar No. 10696
7854 W. Sahara Avenue
Las Vegas, NV 89117
Attorneys for Collegium #32

Amy F. Sorenson, Esq. (NV Bar No. 12495)
Nathan G. Kanute, Esq. (NV Bar No. 12413)
50 W. Liberty Street, Suite 1510
Reno, NV 89501-1961
*Attorneys for Wells Fargo Bank, N.A. and
Federal Home Loan Mortgage Corporation*

ABSOLUTE COLLECTION SERVICES, LLC

PENGILLY LAW FIRM

/s/ Shane D. Cox (with permission)

/s/ Elizabeth B. Lowell (with permission)

Shane D. Cox, Esq.
Nevada Bar No. 13852
8440 w. Lake Mead Blvd., Ste. 210
Las Vegas, NV 89128
Attorneys for Absolute Collection Services

Elizabeth B. Lowell, Esq.
Nevada Bar No. 8551
David Markman, Esq.
Nevada Bar No. 12440
1995 Village Center Circle, Ste. 190
Las Vegas, NV 89134
Attorneys for Nuevo Vista HOA

IT IS SO ORDERED.



HON. JAMES C. MAHAN
UNITED STATES DISTRICT COURT JUDGE

DATED: April 26, 2017

CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing
**STIPULATION AND ORDER TO EXTEND TIME TO FILE REPLY IN SUPPORT OF
FEDERAL HOME LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY
JUDGMENT** on the 24th day of April, 2017 by the method indicated:

- ☐ **BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- ☐ **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- ☐ **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- ☐ **BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- ☒ **BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

Shane D. Cox, Esq.
Absolute Collection Services, LLC
8440 W Lake Mead Blvd Ste 210
Las Vegas, Nevada 89128

James W. Pengilly, Esq.
Elizabeth B. Lowell, Esq.
Pengilly Law Firm
1995 Village Center Cir., Suite 190
Las Vegas, NV 89134

Paul R. Connaghan, Esq.
Tara D. Newberry, Esq.
Connaghan Newberry Law Firm
7854 W Sahara Ave.
Las Vegas, NV 89117

/s/ Lara J. Taylor
An employee of Snell & Wilmer L.L.P.